

WATER QUALITY M E M O R A N D U M

Utah Coal Regulatory Program

January 6, 2005

TO: Internal File

THRU: Wayne Hedberg, Permit Supervisor

FROM: James D. Smith, Environmental Scientist

RE: 2004 Third Quarter Water Monitoring, PacifiCorp, Cottonwood/Wilberg Mine, C/015/0019, Task ID # 2020

The mine was sealed May 10, 2001, so in-mine monitoring sites TMA @ 32 and 2ndS XC-11 are no longer accessible. The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported to DOGM or the Division of Water Quality.

1. Were data submitted for all of the MRP required sites? YES [X] NO []
Identify sites not monitored and reason why, if known:

2. On what date does the MRP require a five-year resampling of baseline water data.
See Technical Directive 004 for baseline resampling requirements. Consider the five-year baseline resubmittal when responding to question one above. Indicate if the MRP does not have such a requirement.

Resampling Due Date

Renewal submittal due 3/06/04, renewal due 7/06/04. Baseline analyses were performed in 1996 and 2001 and will be repeated every 5 years, i.e., next baseline analyses will be in 2006.

3. Were all required parameters reported for each site? YES [X] NO []
Comments, including identity of monitoring site:

4. Were irregularities found in the data?

YES [X] NO []

Comments, including identity of monitoring site:

GWR03 September: Ca (n = 33), total alkalinity* (n = 66), total hardness (n = 80), and cation-anion balance (n = 12) were outside the two standard deviation range.

* not a required parameter.

5. Were DMR forms submitted for all required sites?

1st month, YES [X] NO []

2nd month, YES [X] NO []

3rd month, YES [X] NO []

Identify sites and months not monitored:

DMRs were submitted in electronic format (Adobe). DMR data were submitted to the DOGM database as operational parameters, not as DMR parameters.

The pond at the Cottonwood Fan Portal was reclaimed in 2002 and UPDES 22896-002 is no longer reported to DOGM or the Division of Water Quality.

6. Were all required DMR parameters reported?

YES [] NO [X]

Comments, including identity of monitoring site:

DMR parameters that are not included in operational parameter lists in the MRP - such as sanitary wastes, visible foam, and floating solids - are not reported to either Water Quality on the DMRs or to the Division in the electronic submittal.

7. Were irregularities found in the DMR data?

YES [X] NO []

Comments, including identity of monitoring site:

UPDES UT0022896-001 July, August, and September: TDS-D MAX, DMR in lbs/day (n = 1) was outside the two standard deviation range: there is only one value for this DMR parameter in the database (04/01/1995) and there is no operational equivalent.

8. Based on your review, what further actions, if any, do you recommend?

There is no further action recommended at this time.